

Robert A. Julian (SBN 88469)
Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
600 Montgomery Street, Suite 3100
San Francisco, CA 94111-2806
Telephone: 415.659.2600
Facsimile: 415.659.2601
Email: rjulian@bakerlaw.com
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)
David J. Richardson (SBN 168592)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Blvd., Suite 1400
Los Angeles, CA 90025-0509
Telephone: 310.820.8800
Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
Email: drichardson@bakerlaw.com
Email: lattard@bakerlaw.com

Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF DANYLL W. FOIX
IN SUPPORT OF OMNIBUS
OBJECTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
(SUBSTANTIVE) TO CLAIMS FILED
BY ADVENTIST HEALTH
SYSTEM/WEST AND FEATHER RIVER
HOSPITAL D/B/A ADVENTIST
HEALTH FEATHER RIVER (CLAIM
NOS. 59459 and 59996)**

Date: March 25, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: March 11, 2020

Danyll W. Foix declares as follows under penalty of perjury:

1. I am a Partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort Claimants in the above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company. I have personal knowledge of the facts stated herein except as to matters where I indicate otherwise, and as to those matters, I believe them to be true. If called upon to testify, I could and would competently do so.

2. I make this declaration in support of the *Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to Claims filed By Adventist Health System/West and Feather River Hospital d/b/a Adventist Health Feather River (Claim Nos. 59459, 59996)* (the “**Objection**”) filed concurrently herewith.

3. During a January 2, 2020 telephone conference, counsel for the TCC requested that Adventist Health explain the insured and uninsured portions of its claims. In a January 6, 2020 email, counsel for the TCC asked that Adventist Health, among other things, provide documentation of its insurance coverage, identify the payments that have been received, and identify the remaining amount of insurance available to cover yet-to-be-paid damage claims. In further follow-up, in a February 2, 2020 email, counsel for the TCC repeated the request for Adventist Health’s insurance documentation. As of the date of this Declaration, Adventist Health has not provided any of the above-requested information.

4. For the Court’s reference in its consideration of the Objection, attached hereto as are true and accurate copies of the following documents:

Exhibit	Description
1	<i>Cal Fire Investigators Determine the Cause of the Camp Fire</i> , California Department of Forestry and Fire Protection News Release, May 15, 2019.
2	<i>Consolidated Financial Statements (unaudited) for Third Quarter 2019</i> , Adventist Health Municipal Securities Rulemaking Board (“ MSRB ”) Submission, September 30, 2019 (relevant pages only).
3	<i>Consolidated Financial Statements and Supplementary Information for Year Ended December 31, 2018 with Report of Independent Auditors</i> , Adventist Health MSRB Submission, March 29, 2019 (relevant pages only).
4	<i>Offering Memorandum for Taxable Bonds</i> , Adventist Health MSRB Submission, October 23, 2019 (relevant pages only).

Exhibit	Description
5	<i>Offering Memorandum for Revenue Bonds with Consolidated Financial Statement and Report of Independent Auditors, Adventist Health MSRB Submission, August 22, 2018 (relevant pages only).</i>
6	<i>Consolidated Financial Statements and Supplementary Information for Year Ended Decembper 31, 2016 with Report of Independent Auditors, Adventist Health MSRB Submission, April 20, 2017 (relevant pages only).</i>
7	<i>Consolidated Financial Statements and Supplementary Information for Year Ended December 31, 2015 with Report of Independent Auditors, Adventist Health MSRB Submission, March 30, 2016 (relevant pages only).</i>

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 12th day of February, 2020, at San Francisco, California.


Danyll W. Foix